

## INTEROFFICE CORRESPONDENCE

DATE: November 1, 1994

TO: E. A. Keil, EOM, Building 080, X8642/D4405

FROM: C. D. Plankinton, ASO, Building 123, X4321/D5309

SUBJECT: ENVIRONMENTAL TRANSITION INFORMATION FOR BUILDING 889

The following information may be beneficial in your support efforts as the assigned Environmental Coordinator during the Decommission and Dismantle (D&D) of Building 889.

It should be noted that Analytical Services Operations (ASO) had only brief responsibility for Building 889 activities prior to the transfer of operations to Environmental Restoration (ER), therefore the issues identified are not all inclusive of the potential environmental concerns associated with Building 889.

### RCRA INSPECTIONS OF PROCESS WASTE SYSTEM

Building 881 Stationary Operating Engineers (SOE) were conducting RCRA inspections of the process waste system for Building 889 however, Radiological Operations stated October 31, 1994 that only the Radiological Operations Department was allowed access to Building 889 due to airflow concerns.

If this is correct than the potential for missed RCRA inspections does exists.

### RCRA INTERIM STATUS TANK SYSTEM CLOSURE

Closure of the Resource Conservation Recovery Act (RCRA) Interim Status Tank Systems located in Building 889 has been divided among three separate organizations as listed:

- Kirk Tichner, RCRA Permitting and Compliance is writing the RCRA Closure Plan for the ancillary equipment and tanks (40.32 & 40.33) located in Building 886 which previously supported Building 889 operations.
- Craig Cowdery, Environmental Restoration Management and Environmental Science Engineering is responsible for the "old process lines" which are located west of Building 889 in Operatable Unit (OU) 9. The Waste Management Unit (WMU) number for these lines is unclear at this time.

- Anthony Tome, Decommission and Decontamination is tasked with the actual decommission project for Building 889 including removing the process waste ancillary equipment.

#### **HAZARDOUS FLUORESCENT LIGHT TUBES**

Management of fluorescent light tubes in Building 889 is basically nonexistent. The number of discarded fluorescent tubes located in Building 889 exceeds the allowable quantity for establishment of a Satellite Accumulation Area for tube management.

Regulated Waste Operations (RWO) has stated that at this time they are not willing to provide the necessary approval to establish a 90 Day Accumulation Area in the building as this contradicts the recent effort to consolidate the number of 90 Day Accumulation Areas plantwide.

A Property/Waste Release Evaluation (PRE) was obtained from Radiological Engineering for the discarded fluorescent light tubes and submitted to Radiological Operations October 18, 1994. To date the requirements of the PRE have not been fulfilled by Radiological Operations which would allow the fluorescent tubes to be released and included in Phase I of Regulated Waste Operations (RWO) plantwide collection project.

#### **EXCESS CHEMICAL MANAGEMENT**

Some excess chemical management has taken place in the building however the inventory documents available are fairly dated. Most of the chemicals appear to be "product" candidates for the Category III Chemical Management Program. Dean Pierson, Waste Programs can provide guidance in this area.

If you have any questions please contact me at extension 4321 or digital page 5309.

cdp

cc:

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